

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

DURST IMAGE TECHNOLOGY U.S., LLC

Defendants.

Case No.: 15-cv-10690

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Raster Printing Innovations, LLC (“RPI”), by and through its undersigned attorneys, for its complaint against Defendant Durst Image Technology U.S., LLC (“Durst”), hereby alleges as follows:

NATURE OF LAWSUIT

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

THE PARTIES

2. Plaintiff RPI is a limited liability company organized under the laws of the state of Illinois and having offices at 111 W. Jackson St., Suite 1700, Chicago, Illinois 60604.

3. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,796,411 (“the ‘411 patent”), entitled “High resolution real time raster image processing system and method,” issued August 18, 1998. A copy of the ‘411 patent is annexed hereto as Exhibit A.

4. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,828,814 (“the ‘814 patent”), entitled “Reduced cost high resolution real time raster image processing system and method,” issued October 27, 1998. A copy of the ‘814 patent is annexed hereto as Exhibit B.

5. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,949,438 (“the ‘438 patent”), entitled “High resolution real time Raster image processing system and method,” issued September 7, 1999. A copy of the ‘438 patent is annexed hereto as Exhibit C.

6. Defendant Durst is a Delaware limited liability company with its principal place of business at 50 Methodist Hill Drive, Suite 100, Rochester, New York 14623. Defendant Durst transacts business in this judicial district, including partnering with a company located in this judicial district, Spartanics, 3605 Edison Place, Rolling Meadows, Illinois 60008, to produce a component of the equipment accused of infringement in this action, and has offered to provide and/or provided products and/or services in this judicial district and throughout the State of Illinois that infringe claims of the ‘411, ‘814, and ‘438 patents.

7. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

DURST’S ACTS OF PATENT INFRINGEMENT

8. Durst has infringed claims of the ‘411, ‘438 and ‘814 patents through, among other activities, making, using, selling and offering for sale the Durst Tau 330 inkjet label press and accompanying front end raster image processor.

9. Durst’s infringement has injured and will continue to injure RPI unless and until this Court enters an injunction prohibiting further infringement and, specifically,

enjoining further use of products that come within the scope of the '411, '814, and '438 patents.

PRAYER FOR RELIEF

WHEREFORE, RPI ask this Court to enter judgment against Durst, and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate RPI for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the RPI patents began;

- B. Increased damages as permitted under 35 U.S.C. § 284;

- C. A finding that this case is exceptional and an award to RPI of its attorneys' fees and costs as provided by 35 U.S.C. § 285;

- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the RPI patent; and

- E. Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

RPI demands a trial by jury on all issues presented in this Complaint.

Dated: November 28, 2015

Respectfully submitted,

/s/ Anthony E. Dowell
Anthony E. Dowell
aedowell@dowellip.com
DOWELL IP
333 W. North Ave #341
Chicago, Illinois 60610
Phone: (312) 291-8351

**ATTORNEY FOR PLAINTIFF
McAfee Enterprises, Inc.**